



Richard Conlin Seattle City Councilmember

WSDOT
Attn: Allison Ray
999 Third Ave S., Suite 2424
Seattle WA 98104

June 1, 2004

Dear Ms. Ray,

I am writing to comment on the Alaskan Way Viaduct Draft Environmental Impact Statement (DEIS) from my perspective as chair of the Seattle City Council's Transportation Committee. My comments will cover the DEIS in general, address certain specific issues in regard to specific alternatives, and highlight areas where further analysis should be included for the final EIS.

DEIS In General

A central issue of concern is the failure of the DEIS to cover a broad enough area of the City. The Alaskan Way Viaduct project is required not because of traffic congestion or transportation bottlenecks on the current facility, but because it is not safe. For this reason, the goal of the project should be to provide safe transportation alternatives, in an economical and environmentally sound manner.

The current corridor is located on fill and is inherently unstable. Changing traffic patterns to direct a greater share of traffic into areas of the city that are more seismically stable can be less costly, minimize risk, and offer alternatives in the event of roadway failure in the near future.

All of these considerations suggest that a broad corridor should be investigated, including not merely the existing facility but the entire downtown area as far east as I-5, to allow consideration of options that can divert traffic from the current facility. Such options will be necessary in any event to mitigate impacts during the exceptionally long and intense construction periods that any of the alternatives require.

Seattle's Center City Access Strategy, investment in transit, movement of traffic to other routes, and upgrading of other downtown Seattle road corridors must be considered as part of this DEIS.

It is to be noted that the Purpose and Need Statement explicitly does not reference capacity requirements for the current facility corridor, but rather states that the purpose of this proposed action is:

"...to provide a transportation facility and seawall with improved earthquake resistance that maintains or improves mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor." (emphasis added)

This statement should be interpreted broadly as a mandate for creative thinking about transportation alternatives, including transit options and expanding the corridor to examine other alternatives that might involve I-5 or downtown arterials.

The DEIS only covers impacts up to Second Avenue, and fails to consider the real corridor moving traffic to and through downtown. The DEIS assumes choices on the north and south end, without analyzing a full range of alternatives or their impacts. If the DEIS is to cover this elongated stretch of corridor from Lake Union to Spokane Street, and is to address traffic that flows from multiple sources approaching the existing facility (i.e., westbound Mercer traffic, eastbound West Seattle traffic, southbound Interbay traffic), it should not be confined to the narrow pinch point defined by the current structure. Rather, it should include all of downtown and other options such as modifying I-5. If the intent is to narrowly address current facility replacement, it should be broken into at least 3 EIS's for the three segments.

Further, the final EIS needs to fully evaluate the options to the north and south, and include analysis of each option compared to other similar options (for example, the widened Mercer versus the lowered Aurora versus the no action alternative). For instance, while it is mentioned briefly in the aerial alternative, there is no analysis of the covered Aurora plan. Also, the DEIS does not spell out which options to the north and south will work with the five different central corridor alternatives. Whether each option can be used with each alternative is unclear, and needs to be specified for decision makers and the public.

Alternatives

Surface Alternative: The surface alternative appears designed for failure. The poor design and engineering approach to this alternative is wholly inadequate, and other and more promising designs must be explored to provide an objective and appropriate analysis of a surface option. This alternative should be refined further to consider how to make the option viable. Examples could include making it a limited access roadway, with minimal intersections through downtown; or developing serious alternatives for deploying passengers and freight to other modes and facilities, and retaining a 4-lane configuration on the surface. The analysis projects a major problem with the S. Spokane to downtown segment, but provides no options that might address this problem. Please indicate options that might be employed to change this outcome.

The analysis projects an increase from 8 to 14 congested intersections in the surface alternative on Western, First, and Second. Please provide an analysis that includes the impacts on Third, Fourth, and Fifth avenues including assumptions for transit priority for all alternatives.

There is an overpass at Seneca Street included in the surface option, but no reason is given, and no impacts are assessed. This needs to be addressed in the final EIS.

Tunnel Bypass: The DEIS must present data on the capacity assumed for a lane of traffic for limited access and surface arterial. If traffic flows as well as projected in the bypass tunnel option, the DEIS must explain adequately why 6 lanes are required on the surface in this alternative. The DEIS should present other access options for the tunnel that could prevent the necessity to have 6 surface lanes. Please analyze the bypass tunnel option in conjunction with a four lane surface alternative.

Tunnel/Tunnel Bypass: Since access to downtown is not provided in the tunnel options, the DEIS should present more clearly the impacts on surface streets north and south of downtown. The DEIS should clearly explain that the tunnel alternative includes an aerial structure in front of the Pike Place Market, descending from the Bell Street tunnel until it dives into a tunnel in the middle of the waterfront. A true tunnel alternative should also be developed that either fully lids or creates a complete tunnel system. If a truly complete tunnel alternative requires the reconstruction of the Bell Street tunnel, thereby triggering much greater costs than the semi-tunnel proposed in this DEIS, that should be clearly explained.

Further Analysis for Final EIS

There are crucial omissions of analysis from the DEIS that need to be included in the final EIS. These include further analysis of construction impacts; the time value of congestion and other economic impacts during the construction period; modeling of what happens if the viaduct is torn down and not replaced; further information on traffic speed improvements; providing specific ranges for outcomes from the data models used to make choices; an assessment of the uncertainties that might influence the cost of the project; and the use of tolls to finance the project.

- The construction options all assume doing the work while the viaduct is operating. For the final EIS, you should consider an option where the viaduct is shut down for the length of construction, and assess the impacts for traffic in and around downtown. These should then be evaluated in the context of reduced construction time and resultant impacts.
- A crucial omission from the DEIS is the time value of congestion and other economic impacts during the 7.5 to 11 years of 24 hour construction. By choosing 2030, well after the completion date, as the criteria for evaluating the project, the years of costs and impacts are ignored. This is like ignoring the time value of money, for which a discount rate is always assigned in valid economic studies. Please provide a dynamic model of the congestion and economic impacts of the construction period, and assign an appropriate discount rate to measure the no action alternative against.
- The modeling included in the Final EIS should include data on what happens under scenario 2 of the no action alternative including analysis of arterials and I-5 if the Viaduct is torn down and not replaced. It is essential to model this alternative for two reasons: 1) it is possible that resources may not be found for any of the alternatives modeled, and we should know the impacts of this situation; and 2) there are some constituencies who have considerable skepticism regarding the need for the viaduct, some who believe it does not require replacing because it can work adequately, and others who believe that it is a transportation function that can be substituted for.
- An analysis of economic impacts of the alternatives and options should be included in the final EIS. This would also include an analysis of the construction impacts to businesses along the waterfront and in the north and south segments for the different construction options. The impact of construction is potentially catastrophic from an economic standpoint, and must be fully understood. The difference in construction time among the alternatives does not appear to be credible, and must be elucidated more clearly.
- In the DEIS, traffic speed improvements in several options are attributed to "closing difficult ramp connections and improving interchanges." Please indicate the impact of these actions on traffic in and out of downtown. Provide data on what proportion of traffic is assumed to be going in and out of downtown as opposed to through downtown.
- The data used to evaluate options is based on modeling for 2030 outcomes. Data regarding real impacts and choices that were made during the temporary closures of the Viaduct for repairs are not referenced, yet this data would have provided an excellent context within which to evaluate traffic impacts of various alternatives. Relying on a 2030 model to determine impacts requires that the model be validated. Please indicate how this model was validated.

Also displaying point outcomes rather than ranges gives an illusion of precision, when in fact there are ranges of possible outcomes. Please articulate the ranges that were generated as the actual outcomes from the model. If there were not ranges, the model has little or no

validity. Please provide outcomes based on a range of inputs. In addition, such a model must have a series of variables, which have sensitivities and uncertainties associated with them. Please review these sensitivities and key uncertainties that might influence the outcomes of the modeling.

- The analysis does not consider the price elasticity of demand if tolls were used to finance the project. Please provide this.
- The analysis assumption about a mode split for transit needs further study. It does not analyze how that transit operates or is prioritized in the Alaskan Way viaduct corridor and on downtown streets. As a result there is not a basis of information to compare alternatives in addressing the multi-modal aspects of the project.

Finally, the alternatives assume replacing a current facility that is used below its capacity with a level of efficiency and capacity that greatly exceeds current or future use projections. Given the very high demand for transportation funding for a myriad of other projects in the Seattle area, investing this level of resources in this corridor must be assessed against other priorities. Ensuring the current free flow of traffic on State Route 99 in 2030 may preclude easing congestion on Interstate 5, State Route 520, other key corridors, or investing in transit that can mitigate traffic on several corridors. This may be a luxury that the region cannot afford. Therefore, this DEIS must explore alternatives that are clearly affordable and can be combined with other system improvements to have the most positive impacts on the overall transportation system.

Thank you for your consideration of these comments. I look forward to working with the Viaduct Team as this project moves forward.

Sincerely,

Councilmember Richard Conlin
Chair, Transportation Committee